

Talking Points Regarding Total Reclaim and Export of Electronics

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Situation:

The Basel Action Network, the environmental watchdog organization, planted tracking devices in hazardous electronic equipment and followed their path to the final recyclers/processors. Total Reclaim was found to have shipped LCD monitors containing mercury lamps to Hong Kong. This violates their e-Stewards Certification by exporting devices that are considered “hazardous” to developing nations.

Background:

There are no federal laws regulating the export of hazardous electronic equipment for recycling/disposal except for the “CRT rule” which was added to the Resource Conservation and Recovery Act (RCRA) several years ago.

- Requires that anyone who intends to export Cathode Ray Tubes (old TVs and Computer Monitors) register with the EPA and get prior approval from receiving country to export.

E-Stewards is based on the [Basel Convention](#) which is a international treaty that is designed to prevent the uncontrolled export of hazardous wastes to developing countries. The U.S. is the only developed nation that has not ratified the Basel Convention. This means that U.S. companies can still export their hazardous electronics without any enforcement by the federal government.

- The types of electronic products that fall under the definition of “hazardous” are parts containing lead solder, mercury bearing components (LCD screens with mercury bulbs), CRTs and batteries containing lead, cadmium, mercury.
- Exporting hazardous equipment to developing nations where it is cheaper and there are fewer regulations has been the norm, not the exception. Voluntary electronics recycling certification programs like [e-Stewards](#) were created to prevent export.
- [E-stewards Recyclers](#) (who follow the Basel Convention regulations) can only export to developed nations. They cannot export to developing nations unless there is a bilateral or multilateral agreement in place with that nation.

Total Reclaim, along with many other recyclers who were not e-Stewards members, exported hazardous electronics to Hong Kong for recycling. Total Reclaim made the news, not solely because they exported, but because they were an e-Stewards member AND they exported. Other recycling programs such as the program run by Dell and Goodwill have also been mentioned in the media. The full report and details on how the e-Trash Transparency Project was conducted by the Basel Action Network can be found on their [website](#). There may be additional reports on the outcomes of this project over the next several months.

What does this mean to King County and Washington State?

King County's Take it Back Network: While it is not required that [Take it Back Network](#) members be e-Stewards, we do require that all hazardous materials are processed domestically or in developed nations. Total Reclaim has been removed from the website and are working with the attorney on next steps.

E-Cycle Washington: Total Reclaim was one of seven processors that have met the "Preferred Processing Standards" required of the e-Cycle Washington program to recycle electronics for the program. The Washington Materials Management and Finance Authority (WMMFA - the stewardship organization operating the program) and Ecology are looking into the situation to determine whether Total Reclaim has violated these standards and what the next steps will be. It is not a requirement of e-Cycle WA program that processors be e-Stewards certified. The (WMMFA) has six other processors that will continue to process equipment in the meantime.

State Electronics Recycling Contract: King County uses the state contract with Total Reclaim for recycling its internally generated electronics. John Allen with the Washington Department of Enterprise Services who administers that contract is working on providing another e-Stewards recycler to be a Sub-Contractor via the state electronics recycling contract. They are exploring the certified e-Steward recycler URT, www.universalrecyclers.com, who has a location in Clackamas, Oregon as an alternate. John's contact info:

John W Allen III

Contracts Specialist

Washington State Dept of Enterprise Services

Contracts, Procurement & Risk Management

Phone: 360-407-8406

Email: john.allen@des.wa.gov